

**IN THE UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF ALABAMA
SOUTHERN DIVISION**

IN RE: BLUE CROSS BLUE SHIELD
ANTITRUST LITIGATION
(MDL No. 2406)

Master File No. 2:13-CV-20000-RDP

This document relates to all cases.

**JOINT MOTION FOR ENTRY OF EXPERT STIPULATION
AND PROPOSED ORDER**

Plaintiffs and Defendants respectfully move for entry of the attached Expert Stipulation and Proposed Order. The parties have met and conferred at length in order to draft the Expert Stipulation, which is designed to allow expert discovery in this MDL to proceed in an orderly and efficient manner. The parties therefore request that Magistrate Judge Putnam enter the Expert Stipulation and Proposed Order.

Dated: April 15, 2015

Respectfully submitted,

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CERTIFICATE OF SERVICE

I hereby certify that on April 15, 2015, the foregoing was electronically filed with the Clerk of Court using the CM/ECF system, which will send notification of such filing to all counsel of record.

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